

KESTENBAUM, DANNENBERG & KLEIN, LLP

ATTORNEYS AND COUNSELORS AT LAW
260 MADISON AVENUE • 17th FLOOR
NEW YORK, NEW YORK 10016
(212) 486-3370 • Fax: (212) 486-3371
www.kdklaw.com

Jeffrey C. Dannenberg, Esq.
Member of NY and CT Bars
Email: jdannenberg@kdklaw.com

Connecticut Office:
55 Greens Farms Road
Westport, CT 06880
(203) 319-9600

July 29, 2019

VIA ECF FILING

Honorable George B. Daniels
United States District Court, S.D.N.Y.
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 11A
New York, NY 10007

Re: *Trans Commodities, Inc. v. Rashid Temirbulatovich Sarsenov, et al.*
S.D.N.Y. Case No. 19 Civ. 3874 (GBD)
Request for Adjournment of Initial Pretrial Conference

Dear Judge Daniels:

I am the attorney of record for plaintiff in the above-referenced action, the Complaint in which was filed via ECF on April 30, 2019, and the Summons in which was issued on May 6, 2019. By Order dated May 1, 2019 (ECF No. 7), the Court scheduled an Initial Pretrial Conference for August 13, 2019 at 9:30 am.

The defendants in this action include both individuals and business entities, all residing or based in the Republic of Kazakhstan. To date, service has not been made on any of the defendants (and, therefore, no appearance have been made by any opposing counsel), largely because there have been a number of communications, which are ongoing, between intermediaries for plaintiff and the principal defendant, Mr. Sarsenov, in an effort to resolve the entire dispute.

Based upon the foregoing, and our not yet having obtained jurisdiction over any of the defendants, it is respectfully requested that the date and time of the Initial Pretrial Conference be postponed for at least ninety (90) days, in order to allow plaintiff either to resolve the dispute through its continued efforts to communicate with the principal defendant or by our effecting service in a manner permitted under FRCP Rule 4(f) (it being noted that the 90-day limit for service under Rule 4(m) does not apply in

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instances, such as is here the case, where each of the defendants resides and is located outside the United States.

No prior request has been made for an adjournment of the Initial Pretrial Conference.

Respectfully yours,

Jeffrey C. Dannenberg

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